

James S. Lowrie (USB #2007)
Jessica P. Wilde (USB #11801)
JONES WALDO HOLBROOK & McDONOUGH PC
170 South Main Street, Suite 1500
Salt Lake City, Utah 84101
Telephone: (801) 521-3200
jlowrie@joneswaldo.com
jwilde@joneswaldo.com

Attorneys for Plaintiff Global Freight Systems Co. W.L.L.

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

GLOBAL FREIGHT SYSTEMS CO. W.L.L.;
GAMA CENTER; and GENOA PLASTIC
INDUSTRIES,

Plaintiffs,
vs.
AL-MORRELL DEVELOPMENT, L.L.C. and
PAUL A. MORRELL,

Defendants.

**DECLARATION OF RICHARD S.
ALTMAN**

Case No. 1:14-cv-00133-TC

Honorable Tena Campbell

Richard S. Altman, being duly sworn, deposes and says:

1. I am an attorney licensed to practice law in the state of New York and I practice law at Reisman, Rubeo, McClure & Altman, LLP, located in Hawthorne, New York.
2. I make this Declaration in support of an award of attorney fees and costs that have been incurred by plaintiff Global Freight Systems Co. W.L.L. (“Global Freight”).
3. I have known Joseph Thomas of Global Freight for several years and have represented Global Freight in this matter and prior engagements.

4. My representation of Global Freight in connection with this matter commenced January 2013.

5. My billing rate is \$375 per hour, and is reasonable for the rates charged by New York attorneys.

6. I have drafted demand letters for Global Freight and assisted James S. Lowrie and Jessica P. Wilde of Jones Waldo Holbrook & McDonough, PC in their representation of Global Freight in the above-captioned matter.

7. The total amount of fees that Global Freight has incurred in connection with my representation is \$4,609.¹

8. A Statement of Account, attached as Exhibit A, summarizes all of the invoices that have been sent to Global Freight and the payments that have been made by it.

9. Further, the invoices I have sent to Global Freight are attached as Exhibit B. The billing entries contained in the invoices include minor redactions to protect the attorney-client privilege.

I declare under criminal penalty of perjury, pursuant to U.S.C. § 1746, that the foregoing is true and correct.

EXECUTED this 30th day of September, 2015.

/s/ Richard S. Altman (executed with permission)
Richard S. Altman
(Original is on file with Plaintiff's counsel and may
be provided upon request)

¹ One deduction in the amount of \$112.50 has been made, representing time billed by me on January 21, 2014, which was related to a separate matter. See January 31, 2014 Invoice, attached as Exhibit B.

ELECTRONIC CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of September, 2015, I caused the foregoing **DECLARATION OF RICHARD S. ALTMAN** to be served, via electronic filing, on the following:

Gary Anderson
Christian Hansen
595 South Riverwoods Parkway, Suite 100
Logan, Utah 84321
gary@hao-law.com
christian@hao-law.com

/s/ Jessica P. Wilde